

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

In re:

**THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,  
as representative of**

**PROMESA  
TITLE III  
Case No. 17-BK-3283  
(LTS)**

**THE COMMONWEALTH OF PUERTO RICO, et al.,  
THE EMPLOYEES' RETIREMENT SYSTEM  
OF THE GOVERNMENT OF  
THE COMMONWEALTH OF PUERTO RICO,  
AND THE PUERTO RICO  
PUBLIC BUILDINGS AUTHORITY**

**Debtors**

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**JOINDER OF CREDITOR DEMETRIO AMADOR INC./DEMETRIO AMADOR ROBERTS TO SUCESIÓN PASTOR MANDRY MERCADO'S, EXCEPTING JAVIER MANDRY MERCADO, OBJECTION TO THE SEVENTH AMENDED TITLE III JOINT PLAN OF ADJUSTMENT OF THE COMMONWEALTH OF PUERTO RICO, ET. AL FILED AT DOCKET NUMBER 17998**

**TO THE HONORABLE UNITED STATES DISTRICT COURT  
JUDGE LAURA TAYLOR SWAIN:**

COMES NOW, CREDITOR DEMETRIO AMADOR INC. / DEMETRIO AMADOR ROBERTS, ("AMADOR"), through the undersigned counsel to file this Joinder (the "Joinder") to the Objection to the Seventh Amended Title III Joint Plan of Adjustment of The Commonwealth of Puerto Rico, Et. Al, filed by Sucesión Pastor Mandry Mercado, excepting Javier Mandry Mercado, at docket number 17998.

1. AMADOR files this Joinder to the relief sought in the Objection filed by Sucesión Mandry and adopts the legal arguments set forth therein.
2. The proof of claim filed on behalf of AMADOR is number 25984 filed on June 15, 2018, in the amount of \$1,600,000.00, in the Commonwealth Title III PROMESA proceeding. The proof of claim stands as a valid claim and has not been objected by the Title III Debtor. The representative of Amador is Jose Hidalgo, Esq., PO Box 19079, San Juan, PR 00919.
3. The AMADOR claim stems from a taking of property by the Commonwealth in direct and inverse condemnation proceedings without just compensation as required by the Takings Clause under the Fifth Amendment of the Constitution of the United States and Article II, section 9 of the Constitution of the Commonwealth of Puerto Rico.
4. AMADOR joins the Objection filed by Sucesión Pastor Mandry Mercado and opposes the classification and treatment provided to AMADOR and all other eminent domain and inverse condemnation creditors. The confirmation of the Seventh Plan of Readjustment should be denied because the plan fails to correctly classify the eminent domain and inverse condemnation creditors; fails to recognize these claims as non-dischargeable; fails to pay the just compensation, and forsakes the requirements under the Takings Clause of the Fifth Amendment of the Constitution of the United States.
5. In addition to the joining the legal grounds and arguments expounded in the

Objection filed by Sucesión Pastor Mandry Mercado at docket number 17998, AMADOR reserves its right to present additional arguments beyond the issues to be argued at the hearing on the Objection.

**WHEREFORE**, AMADOR, respectfully requests that the Court grant the Opposition filed by Sucesión Pastor Mandry Mercado filed at docket number 17998.

**RESPECTFULLY SUBMITTED.**

In Guaynabo, Puerto Rico, this 19<sup>th</sup> day of October 2021.

COUNSEL FOR AMADOR  
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